

EXHIBIT B

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES,
 INC., PASSENGER SEXUAL
 ASSAULT LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF WILLIAM ANDERSON
 REGARDING SAFETY POLICIES AND
 KNOWLEDGE BASES PURSUANT TO THE
 COURT’S JANUARY 23, 2025 ORDER (ECF
 2138)**

This Document Relates to:

 ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
 Courtroom: G – 15th Floor

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DECLARATION OF WILLIAM ANDERSON

I, William Anderson, declare as follows:

1. I am over 18 years of age and competent to make the statements in this declaration. This declaration is provided pursuant to and under the provisions of the Protective Order previously entered in this matter.

2. This declaration is provided to comply with the Court’s January 23, 2025 Order requiring Uber to submit a declaration “that explains how its relevant policies, as well as its guidelines and operating procedures implementing those policies, have been stored and organized during the relevant period in this MDL, and when they have been updated.” ECF 2138, at 1-2.

3. I am a Manager, eDiscovery at Uber Technologies, Inc. (“Uber”). I have been employed at Uber since October 2015, and have held my current position since March 2024. At Uber I previously held the positions of Senior Discovery Analyst II, Senior eDiscovery Analyst, Executive Support Technician, and Computer Technician. Over the course of my employment at Uber, I have acquired personal knowledge of Uber’s communication tools and data sources.

4. The contents of this declaration are true and correct to the best of my knowledge, information, and belief, and are based on my personal knowledge of Uber’s discovery capabilities as they relate to Uber’s communication tools and data sources and/or informed conversations with knowledgeable employees at Uber.

I. Safety Policies and Standards

5. Safety policies and standards at Uber are corporate documents setting forth the principles that govern the actions of the company’s organizations that address safety issues on the Uber platform, and those organizations’ managers and employees. These documents crystalize how Uber operates its business with regard to safety.

6. Uber creates, stores, and organizes its policies on the Google Drive platform. As such, company policies are maintained as living documents. Accordingly, the operative version of a given policy may include “suggestions” (tracked changes) or comments. These policies are

1 “owned” by an individual employee or team, and access to view, comment upon, or edit a policy
2 may be limited, using the access standard controls within Google Drive.

3 7. Uber is currently engaged in an effort to integrate those policies and standards into
4 a different system, called ServiceNow. This effort is in its early stages, and the policies
5 ServiceNow will house will consist of PDF printouts of company policies stored on Google
6 Drive. ServiceNow will not house anything that is not available within Google Drive.

7 8. Upon information and belief, Uber updates its company policies and standards
8 from time to time, but does not do so on a fixed cadence. Many of Uber’s policies related to rider
9 safety were created, updated, or otherwise refined in concert with the development of the
10 Taxonomy from 2017 to 2019.

11 **II. Guidelines and Operating Procedures Implementing Uber’s Safety Policies,**
12 **i.e. Knowledge Bases**

13 9. Uber refers to guidelines and operating procedures developed to implement
14 company safety policies and standards as “Knowledge Bases.” At one time these Knowledge
15 Bases were called “Support Logic,” and Uber employees may refer to them as such. Knowledge
16 Bases are not accessible by independent drivers. They are available to support agents, and
17 employees who provide customer service and other support to the business.

18 10. Prior to 2019, these Knowledge Bases were housed on the company’s “TeamDot”
19 intranet.

20 11. From 2019 until August, 2024, these Knowledge Bases were housed on a
21 Salesforce platform, which maintained up to twenty (or 20) versions, including the current
22 version, of each Knowledge Base.

23 12. In August 2024, Uber migrated these Knowledge Bases to its uKnowledge system,
24 which uses the KMS Lighthouse platform.

25 13. While these Knowledge Bases have been and are housed on a common cloud
26 computing infrastructure, no overall index exists, though groups of Knowledge Bases may be
27 grouped thematically into landing pages called “Homepages” or “Repositories.” These
28

1 Knowledge Bases are accessible to employees on an as-needed basis, depending on the
2 employees’ roles and responsibilities within the company.

3 14. Upon information and belief, Uber employees update Knowledge Bases from time
4 to time, depending on factors relating to the specific subject matter of the Knowledge Base in
5 question. There is no fixed cadence for these updates, though many of Uber’s Knowledge Bases
6 related to rider safety support were created or updated to reflect additions or updates to Uber’s
7 policies in connection with the development of the Taxonomy from 2017 to 2019.

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9 Executed on January 31, 2025, at Denver, Colorado.

William Anderson

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11 WILLIAM ANDERSON
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